

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

GAIL DINES,  
Plaintiff,

v.

WHEELOCK COLLEGE,  
a corporation, JACKIE JENKINS-SCOTT, in  
her official and individual capacities,  
KATHERINE S. TAYLOR, in her official and  
individual capacities; and KINGSTON BAY  
GROUP, a limited liability corporation,  
Defendants.

C.A. No. 1:16-cv-11876-GAO

**AFFIDAVIT OF SCOTT A. ROBERTS**

I, Scott A. Roberts, declare the following:

1. I am attorney licensed to practice law in the Commonwealth of Massachusetts, and I am a founding partner of the law firm of Hirsch Roberts Weinstein LLP.

2. I am trial counsel for Defendants Wheelock College, Jackie Jenkins-Scott, and Katherine S. Taylor (collectively, the “Wheelock Defendants”) in this action.

3. This affidavit is filed in support of the Wheelock Defendants’ Opposition to Plaintiff’s Motion for Admission of Visiting Lawyer *Pro Hac Vice* (the “Motion”).

4. On October 31, 2016, Plaintiff’s counsel, Anita Vadgama, conferred with me by phone about the Motion. During this conversation, I advised Attorney Vadgama that the Wheelock Defendants intended to oppose the PHV Motions in part due to Attorney Ann Olivarius’s unauthorized and improper direct communications with Wheelock.

5. Attorney Vadgama replied by email on the same day. A copy of the October 31, 2016 email from Attorney Vadgama is attached as Exhibit A.

6. A copy of Attorney Vadgama’s profile on LinkedIn.com is attached as Exhibit B.

7. A copy of Attorney Kathleen Hallisey's profile on LinkedIn.com is attached as Exhibit C.
8. Attached hereto as Exhibit D is a copy of an opposition, obtained from the Pacer electronic filing system, which the University of Miami filed in opposition to Attorney Olivarius's motion for *pro hac vice* admission in *Morrison v. University of Miami, et al.*, No. 1:15-cv-23856 (S.D. Fla. Nov. 5, 2015) ("*Morrison*").
9. Attached hereto as Exhibit E is a copy of an order allowing Attorney Olivarius's motion for *pro hac vice* admission in *Morrison*, also obtained from the Pacer electronic filing system.
10. Attached hereto as Exhibit F is a copy of an October 30, 1987 letter from the Honorable Marilyn Hall Patel, District Judge for the United States District Court Northern District of California, to Attorney Olivarius, filed in *Olivarius v. Friedman et al.*, No. 1:05-cv-00717 (N.D. Md. Mar. 14, 2005), and obtained from the Pacer electronic filing system.
11. Attached hereto as Exhibit G is a copy of McAllister Olivarius's firm history cached on [www.zoominfo.com](http://www.zoominfo.com).
12. Attached hereto as Exhibit H is a memorandum in support of sanctions filed in *Olivarius v. Friedman et al.*, No. 1:05-cv-00717 (N.D. Md. Mar. 14, 2005), obtained from the Pacer electronic filing system.
13. Attached hereto as Exhibit I is a notice from the United States District Court for the District of Minnesota suspending Attorney Olivarius, obtained from the Pacer electronic filing system.

14. Attached hereto as Exhibit J is an order from the United States District Court for the Southern District of Florida dated April 16, 2012, obtained from the Pacer electronic filing system.

I declare under the penalties of perjury on this 10th day of November 2016 that the foregoing is correct and true.

/s/ Scott A. Roberts  
Scott A. Roberts (BBO No. 550732)

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants on November 10, 2016.

/s/ Scott A. Roberts